



Montana Department of
ENVIRONMENTAL QUALITY

1226564 - R8 SDMS

Brian Schweitzer, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • www.deq.mt.gov

September 29, 2006

Roger Hoogerheide
Superfund RPM
U.S. EPA Region 8 (8EPR-SR)
999 18th Street; Suite 300
Denver CO 80202-2466

Re: Cooperative Agreement for Libby-Troy Operable Unit 07

Dear Mr. Hoogerheide:

Per your request, the Montana Department of Environmental Quality (DEQ) is providing a status report on the above mentioned Cooperative Agreement. Section 4.2.4 details the Project Deliverables and Reports required under the Cooperative Agreement. The following text is from Section 4.2.4 and identifies the status of each deliverable in *italic* font.

A. Progress Reporting Requirements

DEQ's contractor(s) shall prepare monthly progress reports to describe the technical and financial progress of the project. *DEQ's contractor provides monthly progress reports to DEQ, which can be made available to EPA upon request.*

B. Community Relations Plan (CRP)

The CRP documents the history of community relations, identifies issues of community concern and describes community involvement activities that DEQ will conduct during the TCSS. DEQ's state project officer in consultation with DEQ's Remediation Division Public Information Officer (PIO) shall prepare a draft and final CRP. Prior to completing the final CRP, DEQ shall incorporate all EPA comments on the draft CRP. *DEQ prepared the Community Involvement Plan in June of 2005. Copies are available at the EPA Information Center in Libby, Troy City Hall, EPA offices in Denver, and DEQ's offices in Helena.*

C. Historic Data Summary Report (HDSR)

The HDSR, if determined necessary by DEQ and EPA, identifies and summarizes pertinent historical information and data collected at the Troy OU7. DEQ's contractor shall prepare a draft and final HDSR. HDSR information and data will be presented in a combination of text and tabular format with appropriate figures and maps. Prior to finalizing the HDSR, DEQ's contractor shall incorporate all DEQ and EPA comments on the draft HDSR. *DEQ has determined a HDSR is not necessary. DEQ has found data for approximately 25 properties in the Troy OU. DEQ's contractor will review the available data to determine if an additional field visit is necessary to meet the objectives of the Troy Asbestos Property Evaluation (TAPE).*

D. Troy Contaminant Screening Study Work Plan (TCSS)

The TCSS WP shall identify and document research, data evaluation, field reconnaissance, and data collection tasks to be conducted during the TCSS. DEQ's contractor shall prepare a draft and final CSS WP. Prior to finalizing the CSS WP, DEQ's contractor shall incorporate all DEQ and EPA comments on the draft CSS WP. *DEQ prepared preliminary data quality objectives (October 2005), attended a scoping meeting in Denver (October/November 2005), and provided four drafts of the*

Troy Asbestos Property Evaluation Work Plan (aka TCSS) (January/February 2006) for EPA comment. DEQ released the draft final TAPE for public comment in April 2006. DEQ's distribution included presentations to the LATAG, CAG, Lincoln County Commissioners, and Troy City Council. DEQ also made copies available at the EPA Information Center in Libby and Troy City Hall. DEQ is currently waiting for public comment, if any, and approval from EPA.

E. SAP (Field Sampling Plan and Quality Assurance Project Plan)

SAPs address all field activities necessary to obtain additional site data and contains the FSP and the QAPP. DEQ's contractor shall prepare draft and final FSPs as necessary for each separate field activity. DEQ will use the QAPP prepared for the LCSS. If DEQ determines that any site specific adjustments to that QAPP are needed for the TCSS, DEQ's contractor shall prepare a QAPP addendum. Prior to finalizing each FSP, DEQ's contractor shall incorporate all DEQ and EPA comments on the draft SAP. *The SAP is included in the TAPE (see above).*

F. HSP

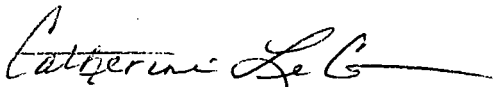
The HSP(s) shall ensure the protection of the investigative team and the general public during TCSS field activities. DEQ's contractor shall prepare draft and final HSP(s) using the documents identified in section 4.2.2.1. Prior to finalizing the HSP, DEQ's contractor shall incorporate all DEQ and EPA comments on the draft HSP. Neither agency will approve the HSP. *The HSP is included in the TAPE (see above).*

G. TCSS Report

The CSS Report provides a summary of all data and information collected as outlined in the CSS WP, including results of all tasks including appropriate electronic data for submission to EPA's V2 database. DEQ's contractor shall prepare a draft and final CSS Report. Prior to finalizing the CSS Report, DEQ's contractor shall incorporate all DEQ and EPA comments on the draft CSS Report. *The TCSS Report is not applicable until after the field work is completed. DEQ anticipates completing the field work in 2007. DEQ and EPA will continue discussions regarding the contents of the TCSS Report, most importantly data results.*

I look forward to working with you to continue forward progress on the Troy OU investigation. Please feel free to contact me with any questions or concerns. I can be reached at 406-841-5040 or electronically at clecours@state.mt.us.

Sincerely,



Catherine LeCours
Superfund Project Manager
Remediation Division